

**UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**OKWESILIEZE WOMEN'S CLUB OF  
NIGERIA INTERNATIONAL and  
GBOLIWE "GRACIE" CHUKWU**

***Plaintiffs,***

**V.**

**DE OKWESILIEZE INTERNATIONAL  
WOMEN'S CLUB, IJEOMA OPARA**

***Defendants.***

www.pearsoned.com

**Case No.: 4:20-CV-0285**

**NOTE THE COURT:** This document was inadvertently omitted from the filings of August 14, 2020. The Exhibits mentioned in it have already been filed as Docs. 1-1 to 1-5.

## DEFENDANTS' NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendants, DE  
OKWERSILIEZE INTERNATIONAL WOMEN'S CLUB ("DE  
OKWESILEZE") and IJEOMA OPARA file this Notice of Removal, and  
would respectfully show the Court the following:

## Introduction

I. On July 9, 2020 the Plaintiff, OKWESILIEZE WOMEN'S CLUB OF NIGERIA INTERNATIONAL ("Plaintiff"), filed a lawsuit against DE OKWESILIEZE INTERNATIONAL WOMEN'S CLUB in Cause No. 2020-40705; Okwesilieze Women's Club of Nigeria International v. De Okwesilieze International Women's Club and Ijeoma Opara; In the 281<sup>ST</sup>

Judicial District Court of Harris County, Texas. A copy of the Original Petition is attached as Exhibit 1. Service of process was made upon Defendants on or about July 15, 2020.

2. Defendants consent to this Removal and timely file this Notice of Removal within the 30-day deadline required by 28 U.S.C. §1446(b).

### **Bases for Removal**

3. Removal is proper based on federal question jurisdiction. 28 U.S.C. § 1331. Plaintiffs claims are predicated on the Lanham Act, 15 USC Sec. 1051 et seq. The duplicative state trademark claims and other state claims are removable on the basis of pendent or supplemental jurisdiction.

4. All requirements are met for removal under 28 U.S.C. §§ 1331 and 1441(b).

5. Venue is proper in this Court under 28 U.S.C. § 1441(a) because this district and division embrace Harris County, Texas, the place where the removed action has been pending.

6. Pursuant to 28 U.S.C. § 1446(d), a copy of this Notice of Removal would be filed with the Clerk of the 215th Judicial District Court of Harris County, Texas and served on all parties.

7. All pleadings, process, orders, and other filings in the state court action are attached to this notice as required by 28 U.S.C. §

1446(a). Those filings consist of Exhibit 1 (Original Petition) and the following additional filings, as required by Local Rule 81:

Exhibit 2: Defendants Original Answer

Exhibit 3: The Docket Sheet

Exhibit 4: An index of matters being filed; and

Exhibit 5: List of all counsels of record and parties represented.

### **Jury Demand**

8. Pursuant to Federal Rule of Civil Procedure 38, Defendants' demand a trial by jury.

### **Prayer**

Defendants respectfully give notice that this state court action has been removed and placed on this Court's docket for further proceedings. Defendants further requests any additional relief to which they are justly entitled.

Respectfully Submitted:

\s\ James O. Okorafor  
JAMES O. OKORAFOR  
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Attorney for Defendants'

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the forgoing instrument was served via the Court's Electronic Filing System on August 18, 2020 to Plaintiffs counsels of record and\or to their email addresses.

/s/ James O. Okafor  
James O. Okorafor